

**STATEMENT OF BASIS (AI No. 38841)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0123421 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Southern Wireline Service, Inc.  
PO Box 428  
Youngsville, LA 70592

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Maxon Graham

**DATE PREPARED:** 3 December 2007

**1. PERMIT STATUS****A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. NPDES permit -** NPDES permit effective date: N/A  
NPDES permit expiration date: N/A  
EPA has not retained enforcement authority.

**C. LPDES permits -** LPDES permit effective date: N/A  
LPDES permit expiration date: N/A

**D. Date Application Received:** 2 November 2007

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - Oilfield Service facility**

This is an oilfield service facility that rents, washes and maintains oilfield wireline units. The facility does not produce any product, however operations include washing and maintenance of oilfield service equipment specializing in wireline units.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 1389

**C. LOCATION -** 4530 Decon Road, Youngsville, Lafayette Parish  
Latitude 30 5 ' 6", Longitude 92 1' 26"

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### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: equipment washdown wastewater  
Treatment: series of oil/water separators then through a transfer sump and a carbon filtration chamber before discharge  
Location: at the southeast side of the facility  
Flow: 1000 gpd  
Discharge Route: local drainage to Darby Coulee thence into Bayou Parc Perdu

#### Outfall 002

Discharge Type: treated sanitary wastewater  
Treatment: mechanical treatment plant with solids separation and aeration  
Location: at the south side of the facility  
Flow: 250 gpd  
Discharge Route: local drainage to Darby Coulee thence into Bayou Parc Perdu

### 4. RECEIVING WATERS

STREAM - local drainage to Darby Coulee thence into Bayou Parc Perdu

BASIN AND SEGMENT - Vermilion - Teche Basin, Segment 060802

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- f. agriculture

### 5. TMDL STATUS

Subsegment 060802, Vermilion River – From LA 3073 Bridge to ICWW, is not listed on LDEQ's Final 2004 303(d) list as impaired. However, subsegment 060802 was previously listed as impaired for phosphorus, Nitrogen (nitrate + nitrite as N), Organic enrichment/low DO, pathogen indicators, Suspended solids/turbidity/siltation and carbofuran, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards. Suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have a reasonable potential to cause or contribute to an excursion above present state water quality standards were also eliminated.

The following TMDL's have been established for subsegment 060802: *Vermilion River Dissolved Oxygen and Nitrogen TMDL* (Federal Register Notice: Volume 66, Number 66, pages 18087-18089 (4/5/2001)), *Vermilion River Fecal Coliform TMDL* (Federal Register Notice: Volume 66, Number

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66, pages 18087-18089 (4/5/2001)), *TMDL for TSS, Turbidity and Siltation for the 15 subsegments in the Vermilion River Basin* (Federal Register Notice: Volume 67, Number 85, pages 22080 - 22082 (5/2/2002)), *TMDL for the Pesticide Carbofuran in the Mermentau and Vermilion Teche - River Basins* (Federal Register Notice: Volume 67, Number 55, pages 13144 - 13145 (3/21/02)).

*The Mermentau River and Vermilion-Teche River Basins TMDL for the pesticide Carbofuran* was finalized on March 21, 2002. Pesticides, which can be attributed to agricultural runoff, are not considered to be discharged from this facility.

Equipment washwater and treated sanitary wastewater discharges from this facility have the potential to discharge pollutants that may contribute to the suspended solids impairment of the receiving stream. As per the *TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin*, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. TSS limits included in the permit will address this impairment.

The DEQ TMDL for Vermilion River Oxygen Demand was incorporated into the EPA TMDL *Vermilion River Dissolved Oxygen and Nitrogen TMDL* (see Federal Register Notice: Volume 66, Number 66, Pages 18087-18089, 04/05/2001). This TMDL did not provide for more stringent limits than those already in place by the Department. LDEQ's position, as supported by the ruling in the lawsuit regarding water quality criteria for nutrients (*Sierra Club v. Givens*, 710 So.2d 249 (La. App. 1st Cir. 1997), writ denied, 705 So.2d 1106 (La. 1998)), is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. LAC 33:IX.2707.C.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through a BOD<sub>5</sub> limitation. Compliance with the BOD<sub>5</sub> limitation as the indicator parameter will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with Part I of the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in Part II of the final permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards. Standard COD limits have been included in the permit and will adequately address the potential to contribute to the organic enrichment/low DO and Nitrogen impairments.

The treated sanitary wastewater from this facility has the potential to discharge fecal coliform. However, this facility was not considered in the Vermilion River Fecal Coliform TMDL (April 5, 2001), and there will be no change in permit requirements based upon a wasteload allocation resulting from this TMDL. Standard Fecal Coliform limits have been included in the permit that will address the potential for further impairment of this waterbody.

As per the February 29, 2000 Delist (Federal Register Notice: Vol. 65, Num. 173, pages 54032-54034, 9/6/2000), assessment of new data and information shows this segment is meeting water quality standards for phosphorus, therefore requirements for total phosphorus will not be placed in this permit.

Given the low volume of wastewater discharged from this facility, compliance with the limitations of

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this permit should not cause or contribute to the violation of water quality standards for organic enrichment/low DO, suspended solids/turbidity/siltation, and nitrogen in the receiving stream.

**6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

**7. COMPLIANCE HISTORY/COMMENTS**

- A. Compliance History - No records of compliance actions were found.  
B. DMR Review - No DMR data were available for review since this is a first time issuance.

**8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 060802 of the Vermilion - Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

**9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

**11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Southern Wireline Service, Inc.

#### 1. Outfall 001 – equipment washdown wastewater (estimated flow is 1000 gpd)

Parameter	Limitation		Reference
	Monthly Average	Daily Maximum	
Flow	Report	Report	LAG750000; BPJ*; similar discharges
TSS	---	45 mg/L	LAG750000; BPJ*; similar discharges
COD	---	300 mg/L	LAG750000; BPJ*; similar discharges
Oil and Grease	---	15 mg/L	LAG750000; BPJ*; similar discharges
pH – Allowable Range (s.u.)	6.0 (minimum)	9.0 (maximum)	LAG750000; BPJ*; similar discharges
Soaps and/or Detergents	Report	N/A	LAG750000; BPJ*; similar discharges
Visible Sheen	---	No Presence	LAG750000; BPJ*; similar discharges

**Treatment:** water goes into a series of oil and water separators then through a transfer sump, then a carbon filtration chamber before discharge

**Monitoring Frequency:** Visible Sheen shall be monitored daily and all other parameters monitored quarterly.

**Limits Justification:** the limits and monitoring frequencies for this permit are based on BPJ, current guidance for similar discharges from other industrial facilities and the Exterior Vehicle Wash Wastewater Permit, LAG750000, effective March 15, 2004. EPA Guidelines for Metal Products and Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements are being placed in the permit.

#### Outfall 002 – treated sanitary wastewater (estimated flow is 250 gpd)

Parameter	Limitation		Reference
	Monthly Average	Weekly Average	
BOD <sub>5</sub>	---	45 mg/L	LAG530000; similar discharges
Fecal Coliform Colonies/100 mL	---	400	LAG530000; similar discharges
Flow	---	Report	LAG530000; similar discharges
TSS	---	45 mg/L	LAG530000; similar discharges
pH – Allowable Range (su)	6.0 (min)	9.0 (max)	LAG530000; similar discharges

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**Treatment:** chlorination

**Monitoring Frequency:** semiannually at the point of discharge from the sewage treatment plant prior to mixing with waters of the state.

**Limits Justification:** limits and monitoring frequencies are based on BPJ, current guidance for similar discharges from other industrial facilities, and the Class I Sanitary General Permit, LAG530000 effective December 1, 2007

*	Existing permits for similar outfalls
BPJ	Best Professional Judgement
su	Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

**STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).